



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 8**

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July 9, 2007

Ref: EPR-N

Linda Slone, RMP Project Manager  
Bureau of Land Management Casper Field Office  
2987 Prospector Drive  
Casper, WY 82604-2968

RE: Proposed Resource Management Plan and  
Final Environmental Impact Statement for  
the Casper Field Office Planning Area  
CEQ#: 20070220

Dear Ms. Slone,

In accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (FEIS) for the Casper Field Office Planning Area in east-central Wyoming.

The Casper planning area includes 8.5 million acres of land, including most of Natrona County, and all of Converse, Goshen and Platte Counties. BLM administers approximately 1.4 million acres of public land surface and 4.7 million acres of federal mineral estate within the Casper planning area. When approved, the Casper RMP will replace the 1985 Platte River RMP.

The FEIS is largely responsive to EPA's concerns regarding the RMP. EPA appreciates the addition of information on wildlife considerations, including the State of Wyoming's Greater Sage-Grouse Conservation Plan. We also recognize that the FEIS clarifies how water quality monitoring activities will be used to make resource management decisions.

EPA also appreciates the clarification of BLM's intent to estimate and mitigate air quality impacts associated with projected oil and natural gas development in the Casper planning area. Through discussions with BLM dating back to 2003, we concurred with the qualitative approach taken in this RMP to disclose the possibility of impacts to air quality. Nevertheless, we remain concerned that a detailed analysis of impacts based on air dispersion modeling is not presented in the RMP. Several Class I areas are located within a 75 to 100 mile radius of the planning area and cumulative development could lead to potential impacts on visibility and other air quality related values. EPA acknowledges BLM's commitment to using dispersion modeling to estimate the impacts of emissions from specific projects. We note that quantitative air quality analyses will take on added importance if BLM contemplates exercising categorical exclusion 3 under section 390 of the 2005 Energy Policy Act in the Casper planning area.

Although BLM expects energy development in the planning area to be comparatively moderate, EPA would be concerned if concentrated development took place on federal lands without a quantitative assessment of potential air quality impacts. BLM's pending statewide air quality analysis, based on dispersion modeling and known as the State of the Atmosphere, will provide quantitative results on projected impacts and might cover the potential impacts of some projects in the planning area. EPA expects that BLM will manage specific projects and activities in a manner that meets criteria air pollutant and visibility standards and protects other air quality-related values.

EPA also provided a substantive comment on the DEIS that focused on Off-Highway Vehicle (OHV) use. While EPA is satisfied that the FEIS includes some management actions to minimize OHV impacts, we note that Preferred Alternative E limits OHV use to "designated roads and trails" in only about 15 percent of the planning area, with most all of the remaining 85 percent managed under a less-restrictive "existing roads and trails" designation. EPA recognizes that this represents a more protective management alternative than Alternative A. However, considering that BLM has identified an increase in OHV use in the Casper planning area as a specific "management challenge," EPA recommends that future management decisions, including the adoption of more restrictive OHV use designations, strive to minimize adverse impacts to the extent practicable. EPA notes that Chapter 3-102 addresses the concerns and management challenges associated with OHV use. Chapter 4-211 also addresses the environmental impacts associated with various OHV use designations, including a description of the environmental benefits associated with the designation, "Limited to Designated Roads and Trails."

BLM's response to EPA's comments on the adequacy of wetlands information in the DEIS references general data on lotic and lentic habitat and condition and a statement in the planning criteria that "decisions in the revised RMP will comply, as appropriate, with all applicable laws, regulations, policy, and guidance." While EPA finds these and other FEIS sections on the protection and enhancement of riparian and wetland habitats reassuring in a general sense, we note that no maps identifying wetland locations and functions are provided. Ultimately, the sound management of wetland resources will require more detailed information about both riparian and non-riparian wetlands. Although not included in the FEIS, EPA assumes that type of information will be developed and consulted as specific management decisions are made.

As we have stated before, EPA recognizes the complexity of the proposed multiple resource management actions and the large geographic scale of this RMP. EPA supports BLM's intention to update the plan based on emerging issues and changing circumstances. We expect that OHV use and wetlands protection will be among the issues and circumstances monitored as the plan is implemented.

EPA appreciates the numerous revisions made in the FEIS based on our comments on the draft document. If you would like to discuss these comments, or any other issues related to the review of the FEIS, please contact Rich Mylott at 303-312-6654.

Sincerely,

/s/ Deborah Lebow

For Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation